

Via Electronic Filing

From: International Association of Audio Information Services
Government Affairs Committee
3825 Ridgewood Road
Jackson, MS 39211

To: Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: MM Docket No. 99-325
Email communications to the Chairman and Commissioners by the International
Association of Audio Information Services (IAAIS)
Ex Parte Notice

Dear Ms. Dortch:

On Friday, October 1st Mr. Michael Duke, Chairman of the IAAIS Government Affairs Committee provided information via email to the Chairman and to the Commissioners regarding recent actions taken by two blindness organizations, IAAIS and the American Council of the Blind (ACB). Transmitted on the following pages are copies of those communications and the two attached files to those email communications.

Should there be any questions regarding this communication please contact Mr. Duke or myself.

Sincerely,

David W. Noble /s/

David W. Noble
Former President, IAAIS
c/o Sun Sounds of Arizona
2323 W 14th St
Tempe, AZ 85281-6950

(480) 774-8300

Michael Duke
Chairman Government Affairs Committee
c/o Radio Reading Service of Mississippi
3825 Ridgewood Road
Jackson, MS 39211

(601) 432-6565

International Association of Audio Information Services
HD Radio Resolution

Whereas: access to current printed information is critical to the continued independence and exercise of democratic freedom for the tens of millions of people living in the United States who have a severe vision impairment or other print-disability; and

Whereas: the member organizations of the International Association of Audio Information Services, IAAIS, have provided substantial daily access to such printed information, including newspapers and other current publications and information, for more than thirty-five years to this population; and

Whereas: substantially improved audio quality of the radio system is both desirable and essential to increased usability of these systems by consumers; and

Whereas: the use of proprietary consumer radio equipment is an anathema to the free exercise of the right of information access; and

Whereas: the HD radio system promulgated by iBiquity Digital Corporation has the potential to provide for the needs of IAAIS members and listeners,

Be it hereby resolved by the Board of Directors of the International Association of Audio Information Services on May 23, 2004 after unanimous concurrence of the delegates to the annual conference of this organization that:

IAAIS supports and promotes substantial improvement in audio fidelity beyond that currently available via existing analog sub-carrier transmissions

IAAIS supports and promotes the preservation of its members' ability to operate within the provisions of the current copyright laws

IAAIS supports and promotes making enhanced information access services increasingly available to its constituent listeners

IAAIS supports and promotes the design and manufacture of fully accessible consumer radios and

IAAIS will support, promote and actively collaborate with any organization, manufacturer or consumer advocacy group which seeks to obtain the same ends as IAAIS, and which does nothing to limit the future growth, accessibility, and availability of broadcast delivered information access services.

AMERICAN COUNCIL OF THE BLIND
RESOLUTION 2004-21

Supports the International Association of Audio Information Services in its call for substantial improvement in audio fidelity over that of existing analog sub-carrier transmissions, supports and promotes the preservation of the ability for all radio reading services to operate within the provisions of the current copyright laws, the making of enhanced information access services increasingly available to persons who are print-impaired, and the design and manufacture of fully accessible radios, and directs its officers, directors, and staff to collaborate with IAAIS and any other organization, manufacturer or consumer advocacy group, in order to ensure the future growth, accessibility, and availability of broadcast delivered information access services.

WHEREAS, printed information is critical to the continued independence and exercise of democratic freedoms for the tens of millions of people living in the United States who have a severe vision impairment or other print disability; and

WHEREAS, for more than 35 years, radio reading services have provided to this population substantial daily access to printed information, including newspapers and other current publications and information; and

WHEREAS, significantly improved audio quality of the radio system is desirable and essential to increased usability of these systems by consumers; and

WHEREAS, the use of proprietary consumer radio equipment is anathema to the free exercise of the right of information access; and

WHEREAS, the International Association of Audio Information Services (IAAIS) has called for substantial improvement in audio fidelity over that of existing analog sub-carrier transmissions; and

WHEREAS, the high-definition (HD) radio systems promulgated by iBiquity Digital Corporation have the potential to provide for the information access needs of blind and print impaired listeners,

NOW, THEREFORE, BE IT RESOLVED by the American Council of the Blind in convention assembled this 9th day of July, 2004, in the Birmingham-Jefferson County Convention Center in Birmingham, Ala., that this organization supports the IAAIS in its call for substantial improvement in audio fidelity over that of existing analog sub-carrier transmissions; and

BE IT FURTHER RESOLVED that the American Council of the Blind supports and promotes the preservation of the ability for all radio reading services to operate within the provisions of the current copyright laws, the making of enhanced information access services increasingly available to persons who are print-impaired, and the design and manufacture of fully accessible radios; and

BE IT FURTHER RESOLVED that this organization directs its officers, directors, and staff to collaborate with IAAIS and any other organization, manufacturer or consumer advocacy group in order to ensure the future growth, accessibility, and availability of broadcast delivered information access services.

Adopted.

Donna Seliger, Secretary

From: Mike Duke [Mike.Duke@mpbonline.org]
Sent: Friday, October 01, 2004 10:27 AM
To: michael.powell@fcc.gov
Cc: david.noble@sunsounds.org
Subject: Blindness Groups and IBOC

Attachments: acb resolution 04-21.doc; iaais digital radio resolution.doc

Dear Chairman Powell:

The membership of the International Association of Audio Information Services (IAAIS) and the membership of American Council of the Blind (ACB) recently passed the attached resolutions about IBOC in their respective conferences. IAAIS is a membership organization of audio information services, which encourages and supports the establishment and maintenance of audio information services that provide access to printed information for individuals who cannot read conventional print because of blindness or any other visual, physical or learning disability.

ACB is one of the two grass-roots membership organizations of blind and visually impaired people. The ACB strives to improve the well-being of all blind and visually impaired people in part by: serving as a representative national organization of blind people, and by conducting a public education program to promote greater understanding of blindness and the capabilities of blind people.

Everyone with a visual impairment, physical disability or learning disability has a right to equal access to all forms of information available to the general public. In the case of IBOC and the digital broadcast of radio services to come, both IAAIS and ACB believe strongly that in order to be truly equal access, it is necessary that the equipment being used to receive this information be user friendly to these individuals.

Because of the Commissions' steadfast support of the equal right of people with disabilities to access telecommunication technology on a par with the general population, we are writing to provide you with the two resolutions, which provide you with a clear understanding of how our memberships feel the IBOC deployment can benefit blind or visually impaired Americans. Here are the main points of the two resolutions:

There must be a substantial improvement in audio fidelity beyond that currently available via existing analog sub-carrier transmissions.

We support and promote the preservation of IAAIS members' ability to operate within the provisions of the current copyright laws via a subscription-style HD service.

We support and promote making enhanced information access services increasingly available to the millions of Americans who are blind, visually impaired and print-disabled.

We support and promote the design and manufacture of fully accessible consumer radios.

On this point, there has been some concern raised by IAAIS and ACB members that manufacturers will not, of their own good will, make HD radios that are usable by people who are blind. To that end, we have asked the National Radio Systems Committee to receive our resolutions at their October 8, 2004 meeting in San Diego. This will be a starting place for sharing our concerns with the manufacturing industry. We hoped that as the Chairman you might find it appropriate to watch this development so as to safe guard the ability of blind people to use radio technology in this new digital era.

Our IAAIS resolution ends with: "IAAIS will support, promote and actively collaborate with any organization, manufacturer or consumer advocacy group, which seeks to obtain the same ends as IAAIS, and which does nothing to limit the future growth, accessibility, and availability of broadcast delivered information access services." We take this opportunity to stress we include the Commission in our wish for open communication and collaboration.

I will be attending the FCC Consumer Advisory Council meeting on November 19th and would be pleased to discuss these resolutions and disability access concerns with you or your staff on November 18 or 19. Thank you for reviewing our resolutions and thank you for supporting the information access rights of blind people everywhere.

Sincerely yours,

Mike Duke /s/

Mike Duke

Chairman IAAIS Government Affairs
Director, Radio Reading Service of Mississippi
(601) 432-6293
Mike.duke@mpbonline.org

CC David Noble
Former President
International Association of Audio Information Services

From: Mike Duke [Mike.Duke@mpbonline.org]
Sent: Friday, October 01, 2004 10:15 AM
To: kathleen.abernathy@fcc.gov
Cc: david.noble@sunsounds.org
Subject: Blindness Groups and IBOC

Attachments: acb resolution 04-21.doc; iaais digital radio resolution.doc

Dear Commissioner Abernathy:

The membership of the International Association of Audio Information Services (IAAIS) and the membership of American Council of the Blind (ACB) recently passed the attached resolutions about IBOC in their respective conferences. IAAIS is a membership organization of audio information services, which encourages and supports the establishment and maintenance of audio information services that provide access to printed information for individuals who cannot read conventional print because of blindness or any other visual, physical or learning disability.

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Because of the Commissions' steadfast support of the equal right of people with disabilities to access telecommunication technology on a par with the general population, we are writing to provide you with the two resolutions, which provide you with a clear understanding of how our memberships feel the IBOC deployment can benefit blind or visually impaired Americans. Here are the main points of the two resolutions:

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Our IAAIS resolution ends with: "IAAIS will support, promote and actively collaborate with any organization, manufacturer or consumer advocacy group, which seeks to obtain the same ends as IAAIS, and which does nothing to limit the future growth, accessibility, and availability of broadcast delivered information access services." We take this opportunity to stress we include the Commission in our wish for open communication and collaboration.

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Chairman IAAIS Government Affairs
Director, Radio Reading Service of Mississippi
(601) 432-6293
Mike.duke@mpbonline.org

CC David Noble
Former President
International Association of Audio Information Services

From: Mike Duke [Mike.Duke@mpbonline.org]
Sent: Friday, October 01, 2004 10:14 AM
To: jonathan.adelstein@fcc.gov
Cc: david.noble@sunsounds.org
Subject: Blindness Groups and IBOC

Attachments: iaais digital radio resolution.doc; acb resolution 04-21.doc

Dear Commissioner Adelstein:

The membership of the International Association of Audio Information Services (IAAIS) and the membership of American Council of the Blind (ACB) recently passed the attached resolutions about IBOC in their respective conferences. IAAIS is a membership organization of audio information services, which encourages and supports the establishment and maintenance of audio information services that provide access to printed information for individuals who cannot read conventional print because of blindness or any other visual, physical or learning disability.

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Our IAAIS resolution ends with: "IAAIS will support, promote and actively collaborate with any organization, manufacturer or consumer advocacy group, which seeks to obtain the same ends as IAAIS, and which does nothing to limit the future growth, accessibility, and availability of broadcast delivered information access services." We take this opportunity to stress we include the Commission in our wish for open communication and collaboration.

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(601) 432-6293
Mike.duke@mpbonline.org

CC David Noble
Former President
International Association of Audio Information Services

From: Mike Duke [Mike.Duke@mpbonline.org]
Sent: Friday, October 01, 2004 10:21 AM
To: michael.copps@fcc.gov
Cc: david.noble@sunsounds.org
Subject: Blindness Groups and IBOC

Attachments: acb resolution 04-21.doc; iaais digital radio resolution.doc

Dear Commissioner Copps:

The membership of the International Association of Audio Information Services (IAAIS) and the membership of American Council of the Blind (ACB) recently passed the attached resolutions about IBOC in their respective conferences. IAAIS is a membership organization of audio information services, which encourages and supports the establishment and maintenance of audio information services that provide access to printed information for individuals who cannot read conventional print because of blindness or any other visual, physical or learning disability.

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Mike.duke@mpbonline.org

CC David Noble
Former President
International Association of Audio Information Services

From: Mike Duke [Mike.Duke@mpbonline.org]
Sent: Friday, October 01, 2004 10:23 AM
To: kjmweb@fcc.gov
Cc: david.noble@sunsounds.org
Subject: Blindness Groups and IBOC

Attachments: acb resolution 04-21.doc; iaais digital radio resolution.doc

Dear Commissioner Martin:

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